

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: Target Corporation Customer Data
Security Breach Litigation

MDL No. 14-2522 (PAM/JJK)

This Document Relates to:

All Financial Institution Cases

Umpqua Bank, Mutual Bank, Village
Bank, CSE Federal Credit Union, and First
Federal Savings of Lorain, individually and
on behalf of a class of all similarly situated
financial institutions in the United States,

Plaintiffs,

vs.

Target Corporation,

Defendant.

**DEFENDANT’S MOTION TO DISMISS THE CONSOLIDATED CLASS
ACTION COMPLAINT**

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendant Target Corporation hereby moves for an order dismissing the Consolidated Class Action Complaint with prejudice.

This motion is based upon all of the files, records, and proceedings herein, including Defendant’s Memorandum Of Law in Support Of Motion To Dismiss the

Consolidated Class Action Complaint and the Declaration of Douglas H. Meal and its exhibits.

Respectfully submitted,

Date: September 2, 2014

s/ Wendy J. Wildung

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